

**Declaration of Debroah A. Edwards**

In accordance with Title 28, United States Code Section 1746, I, Deborah A. Edwards, do declare and state as follows:

1. I am employed by the Federal Bureau of Investigation (FBI) as Unit Chief of Discovery Unit I (DU-I), Discovery, Oversight, and Coordination Section, Litigation Branch, Office of the General Counsel (OGC), located in Washington, D.C. I have served as Unit Chief of DU-I from approximately September 2010 to present. I have been employed by the FBI since April 1990.

2. The statements contained in this declaration are based upon my personal knowledge, my review and consideration of documents available to me in my official capacity, and on information obtained from other FBI employees.

3. DU provides litigation support to other units in OGC, as well as numerous other entities. DU is responsible for locating, reviewing, and processing for release, any and all responsive materials pertaining to litigation and administrative matters in which the FBI is directly or indirectly involved. As Unit Chief of DU-I, I am responsible for overseeing Paralegal Specialists who locate, review, process and produce documents related to a variety of document production requests.

4. I have access to the records contained in the FBI's Central Records System (CRS). I am also personally familiar with the FBI's records maintenance and retrieval system.

5. All records contained in the CRS are identifiable through the FBI's practice of indexing records to a particular subject matter or individual. Once indexed, a record pertaining to a particular subject matter or individual is retrievable through a search of the general indices to the

CRS. In short, the CRS is the FBI's official system of records for all investigative, administrative and official business of the FBI.

6. The CRS enables the FBI to maintain information it has acquired while fulfilling its mandated law enforcement responsibilities. The records maintained here consist of administrative, applicant, criminal, personnel and other files compiled for law enforcement purposes. Searching the CRS is the means by which the agency can determine what retrievable information, if any, it may have in its files on a particular subject matter or individual.

7. I oversaw the Paralegal Specialists, who performed a diligent search of general indices to the CRS as of September 23, 2025.

8. A search of the CRS located an administrative claim, dated May 23, 2023, presented to the FBI by or on behalf of Sandra Ward on or around May 23, 2023. Sandra Ward subsequently submitted a second administrative claim, dated April 24, 2025, presented to the Department of Justice (DOJ) on or around May 13, 2025.

9. A search of the CRS located an administrative claim, dated February 12, 2024<sup>1</sup>, presented to the FBI by or on behalf of Laura Newman, on or around February 25, 2024. Laura Newman subsequently submitted a second administrative claim, dated April 24, 2025, presented to the DOJ on or around May 13, 2025.

10. A search of the CRS located administrative claims presented to the FBI by or on behalf of the remaining Thirty-Two (32) Jane Doe plaintiffs<sup>2</sup>, all of which were presented to the FBI or DOJ on or after May 23, 2023. Twenty-four (24) of these remaining Jane Doe plaintiffs

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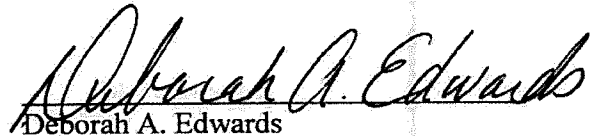
<sup>1</sup> The date on the Standard Form (SF) 95 is 12/02/2024. However, the Final Audit Report provided with the SF 95 indicates that the document was e-signed by Laura Newman on February 12, 2024.

<sup>2</sup> The Plaintiffs' identities are based on the list provided by Plaintiffs' counsel to the United States.

subsequently submitted a second administrative claim, dated April or May 2025, presented to the DOJ on or around May 13, 2025.

I declare under penalty of perjury that the foregoing is true and correct.

September 23, 2025

A handwritten signature in black ink, appearing to read "Deborah A. Edwards", is written over a horizontal line.

Deborah A. Edwards  
Chief, Discovery Unit I  
Litigation Branch  
Office of the General Counsel  
Federal Bureau of Investigation  
Washington, D.C.